

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RALPH S. JANVEY, IN HIS CAPACITY
AS COURT-APPOINTED RECEIVER
FOR THE STANFORD RECEIVERSHIP
ESTATE, AND THE OFFICIAL
STANFORD INVESTORS COMMITTEE

Plaintiffs,

vs.

ADAMS & REESE, LLP; BREAZEALE,
SACHSE & WILSON, LLP; ROBERT
SCHMIDT; JAMES AUSTIN; CLAUDE F.
REYNAUD, JR.; CORDELL HAYMON;
THOMAS FRAZER

Defendants.

Case No. 3:12-CV-495-N-BG

**STIPULATION AND [PROPOSED] ORDER
DISMISSING CERTAIN CLAIMS WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure by and among Plaintiffs Ralph S. Janvey, in his capacity as Court-appointed Receiver for the Stanford Receivership Estate, and the Official Stanford Investors Committee (together, "Plaintiffs"), on the one hand, and Defendants Adams and Reese LLP, Robert Schmidt, and James Austin (collectively, "A&R"), Breazeale, Sachse & Wilson, LLP ("BSW"), Cordell Haymon ("Haymon") and Lynnette B. Frazer, Individually and as Independent Executrix of the Estate of Thomas L. Frazer ("Frazer"), on the other hand, by and through their undersigned counsel, that all claims and causes of action asserted by Plaintiffs against A&R, BSW, Haymon, and Frazer in the above-captioned case are dismissed with prejudice and without costs. Plaintiffs also dismiss with prejudice and without costs all claims asserted against Claude

F. Reynaud, Jr. (“Reynaud”) that are based upon, arise out of, are attributable to, or result from any act, error, omission, circumstance, personal injury, or breach of duty in the rendition of legal services for others (including, but not limited to, The Stanford Trust Company, The Stanford Group Company, The Stanford Financial Group Company, and any other affiliated entity or individual) in Reynaud’s capacity as a lawyer. This order does not apply to claims for breach of fiduciary duty against Reynaud that are based upon, arise out of, are attributable to, or result from Reynaud’s activities as an officer or director of the Stanford Trust Company.

RESPECTFULLY SUBMITTED this 29th day of October, 2015.

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L. Frazer*

SO ORDERED this ____ day of _____ 2015

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UNITED STATES DISTRICT JUDGE